

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

Allison Reindollar	Debtor(s)	Chapter 13
NewRez LLC D/B/A Shellpoint Mortgage Servicing	Movant	1:19-bk-02630-HWV
v. Allison Reindollar	Respondent(s)	Answer
Jack N Zaharopoulos	Trustee/Respondent	

ANSWER

AND NOW, this 12th day of February 2023, the Debtor, Allison Reindollar, by and through counsel, Dawn M. Cutaia, files this Answer to the Motion for Relief from Stay filed by NewRez LLC D/B/A Shellpoint Mortgage Servicing:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted in part; Denied in part. Debtor does admit to falling behind, but she is able to cure some arrears immediately. By way of further answer, Debtor had some medical procedures she was attempting to pay for and didn't remember she could seek a modification of her plan or a pause on her payments. Debtor did not realize she was as behind as she was.

Furthermore, Debtor did not have significant pre-petition mortgage arrears; there was no default or foreclosure action.

11. Denied.
12. Denied.
13. Debtor's admit this may be the tax assessment value but tax assessments are well known to be significantly below the fair market value and it is disingenuous to use that value as relevant to anything other than how the real estate taxes are calculated. Zillow puts the value at \$275,000, Trullia values it at \$275,600, Redfin values it at \$312,970. The actual sales price in 2015 when Debtor purchased it was \$204,000 and in today's market it cannot be worth less than the purchase price. It is highly likely there is a significant equity cushion.
14. Denied.
15. Denied.
16. Denied.

WHEREFORE, the Debtor respectfully requests this Honorable Court deny the Motion for Relief, or grant Debtor the opportunity to get the house appraised to verify the equity cushion, as well as any other relief as may be just and proper.

Respectfully Submitted,

By: /s/ Dawn M. Cutaia

Supreme Court ID 77965

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